

# **EXHIBIT 1**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

**CIVIL MINUTES - GENERAL**

<b>Case No.</b>	CV 13-07764-FMO (AGRx)	<b>Date</b>	December 13, 2018
<b>Title</b>	Yardi Systems, Inc. v. Property Solutions International Inc.		

<b>Present: The Honorable</b>	Alicia G. Rosenberg, United States Magistrate Judge
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Karl Lozada

CS 12/13/2018

None

Deputy Clerk

Court Reporter / Recorder

Tape No.

Attorneys Present for Plaintiffs

Attorneys Present for Defendants

Shawn G Hansen,  
Karina Puttieva,

Christian G Andreu-von Euw,  
Janet S Kim,

**Proceedings:**            **MINUTE ORDER GRANTING IN PART DEFENDANT’S MOTION FOR PROTECTIVE ORDER**

Case is called. Counsel state their appearances.

On October 22, 2018, the District Judge reopened fact discovery until December 31, 2018 “for the following limited purposes: (1) plaintiff may inquire as to Entrata, Inc.’s (“defendant”) relationship with DB Xento Systems Private Limited [“Xento”]; and (2) defendant may seek discovery from Marisa Gaedig and her employer, Sentinel Real Estate Corporation.” (Dkt. No. 349.)

The District Judge’s Order granted in part and denied in part Plaintiff’s motion to modify the court’s scheduling order to reopen limited discovery for inquiry into Entrata, Inc.’s relationship with DB Xento Systems Private Limited (Dkt. No. 334). In its motion, Plaintiff told the court that it sought “(1) documents showing the corporate relationship between Xento and Entrata; (2) communications in which Entrata CEO David Bateman and/or Entrata made representations regarding Entrata’s value to third parties; (3) representations to lenders in connection with Entrata obtaining financing; (4) tax returns for Entrata and Xento; (5) United States Bureau of Economic Analysis forms required to be filed by Entrata and Xento; and (6) Xento’s annual filings with the registrar of companies in India.” (Motion at 2, 5-6.)

On November 21, 2018, Defendant filed a motion for protective order from Plaintiff’s discovery requests as follows: (1) 11 non-party subpoenas; (2) 87 requests for admission; (3) 7 interrogatories; and (4) 8 deposition requests.<sup>1</sup> (Joint Stipulation, Dkt. No. 350.) On November 29, 2018, the parties filed supplemental memoranda. (Dkt. Nos. 354-355.)

The motion was referred to this court and came on for hearing on December 13, 2018. The court also conducted a discovery conference at the request of the parties to discuss outstanding discovery disputes raised in the Joint Report. (Dkt. Nos. 356-357.) The court and counsel conferred as stated on

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<sup>1</sup> Defendant subsequently served responses to Plaintiff’s 31 document requests. Defendant’s motion for protective order reserved Defendants’ right to challenge those requests.

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the record.

For the reasons stated on the record, Defendant's motion for protective order was GRANTED IN PART as follows:

1. Defendant's motion for protective order is granted as to the third party subpoenas to Epic Ventures, Fraser Bullock, General Atlantic, Ilona Capital, Insight Ventures, Nick Efstratis, Sorenson Capital, Tanner LLC and Zions Bank. These third parties need not respond to the subpoenas. (Dkt. No. 350-10.)
2. Defendant's motion for protective order is denied as to Request for Admission No. 45 as follows: On a date to be mutually agreed by counsel, Defendant shall provide Mr. Bateman's percentage ownership interest in Xento from its formation to the present in its response to RFA No. 45. Defendant also agreed to produce the formation document for the predecessor to Xento.
3. On or before December 17, 2018, counsel shall confer regarding a stipulation, or other document agreed by counsel, that will memorialize Defendant's agreement not to shift, or attempt to shift, liability in this case to Xento.
4. On or before December 17, 2018, counsel shall confer regarding (a) production of Mr. Bateman's communications with investors concerning the pertinent issues regarding Xento; and (b) resolution of the other discovery disputes in an efficient manner.
5. Defendant is relieved of the obligation to respond to the other 86 requests for admission, the 7 interrogatories and the 8 deposition requests pending the continued telephonic hearing on Tuesday, December 18, 2018 at 10:00 a.m.

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